

Marc J. Randazza (California Bar No. 269535)
Jason A. Fischer (California Bar No. 275469)
RANDAZZA LEGAL GROUP
mjr@Randazza.com
jaf@Randazza.com
6525 W. Warm Springs Road, Suite 100
Las Vegas, NV 89118
Telephone: 888-667-1113
Facsimile: 305-437-7662
www.Randazza.com

Attorneys for Defendant,
Weican Null Meng

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ZHANG ZIYI, an individual,

Plaintiff,

vs.

Case No. CV12-5216-DMG (PLAX)

DECLARATION OF
J. MALCOLM DEVOY

CHINA FREE PRESS, INC., a North Carolina
non-profit corporation doing business as
BOXUN NEWS; WEICAN NULL MENG, an
individual known as WATSON MENG and also
WEICAN "WATSON" MENG; DOES 1-25,
inclusive,

Defendants.

DECLARATION OF J. MALCOLM DEVOY

I, J. MALCOLM DEVOY, having personal knowledge of the matter set forth
below and being competent to make such statements, state as follows:

1. I am an attorney duly licensed in the states of Wisconsin and Nevada
and am employed by Randazza Legal Group, which is counsel of record for
Defendant Weican Null "Watson" Meng; I am not counsel of record in this case,
though I am personally familiar with the pleadings and facts concerning this
matter.

1 2. I prepared composite Exhibit A, which includes numerous articles
2 available on the Internet, originally published in March and April of 2012, about
3 former Chinese leader Bo Xilai.

4 3. On August 16, 2012, I accessed the news website
5 <seattletimes.nwsources.com>. I located the news article entitled “China replaces
6 once-powerful leader hit by scandal.” The article is dated for March 14, 2012.

7 4. I then saved a copy of the webpage as a portal document format
8 (PDF) file. A true and correct copy of this article is attached in composite Exhibit
9 A.

10 5. On August 16, 2012, I accessed the news website <nytimes.com>. I
11 located the news article entitled “Death of a Briton is Thrust to Center of China
12 Scandal.” The article is dated April 10, 2012.

13 6. I then saved a copy of the webpage as a portal document format
14 (PDF) file. A true and correct copy of this article is attached in composite Exhibit
15 A.

16 7. On August 16, 2012, I accessed the news website <articles.cnn.com>.
17 I located the news article entitled “China moves to contain Bo Xilai scandal.” The
18 article is dated April 11, 2012.

19 8. I then saved a copy of the webpage as a portal document format
20 (PDF) file. A true and correct copy of this article is attached in composite Exhibit
21 A.

22 9. On August 16, 2012, I accessed the news website <www.pbs.org>. I
23 located the news article entitled “China’s state media denounce fallen party official
24 Bo Xilai.” The article is dated April 11, 2012.

25 10. I then saved a copy of the webpage as a portal document format
26 (PDF) file. A true and correct copy of this article is attached in composite Exhibit
27 A.

1 11. On August 16, 2012, I accessed the news website
2 <articles.latimes.com>. I located the news article entitled “China attempts to
3 contain high-level political scandal.” The article is dated April 11, 2012.

4 12. I then saved a copy of the webpage as a portal document format
5 (PDF) file. A true and correct copy of this article is attached in composite Exhibit
6 A.

7 13. On August 16, 2012, I accessed the news website
8 <www.cbsnews.com>. I located the news article entitled “Bo Xilai scandal rocks
9 secretive Chinese leadership.” The article is dated April 12, 2012.

10 14. I then saved a copy of the webpage as a portal document format
11 (PDF) file. A true and correct copy of this article is attached in composite Exhibit
12 A.

13 15. On August 16, 2012, I accessed the news website <uk.reuters.com>. I
14 located the news article entitled “Analysis – China scandal risks sapping will for
15 reform.” The article is dated April 12, 2012.

16 16. I then saved a copy of the webpage as a portal document format
17 (PDF) file. A true and correct copy of this article is attached in composite Exhibit
18 A.

19 17. On August 16, 2012, I accessed the news website <nytimes.com>. I
20 located the news article entitled “Briton in a Chinese Scandal Reportedly Brokered
21 Overseas Money Transfers.” The article is dated April 16, 2012.

22 18. I then saved a copy of the webpage as a portal document format
23 (PDF) file. A true and correct copy of this article is attached in composite Exhibit
24 A.

25 19. On August 16, 2012, I accessed the news website <irishtimes.com>. I
26 located the news article entitled “Allegations to mount against Bo Xilai over
27 British businessman’s death.” The article is dated April 16, 2012.

20. I then saved a copy of the webpage as a portal document format (PDF) file. A true and correct copy of this article is attached in composite Exhibit A.

21. On August 16, 2012, I accessed the news website <foxnews.com>. I located the news article entitled “China says committed to probing political scandal.” The article is dated April 17, 2012.

22. I then saved a copy of the webpage as a portal document format (PDF) file. A true and correct copy of this article is attached in composite Exhibit A.

23. These documents are true and correct copies of the articles as they appeared on the internet, on the respective webpages and URL's indicated in this declaration and within the PDF documents themselves as found in Exhibit A, on August 16, 2012.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated August 17, 2012 in Las Vegas, Nevada

/s/ J. Malcolm DeVoy

J. Malcolm DeVoy